

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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DR. MICHAEL J. DUBIN,

Plaintiff,

v.

Case No. 10 CV 35

Honorable William Conley

BOARD OF MADISON AREA TECHNICAL  
COLLEGE DISTRICT and MADISON AREA  
TECHNICAL COLLEGE - MADISON,

Defendants.

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**PLAINTIFF'S PROPOSED SPECIAL VERDICT - LIABILITY**

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QUESTION NO. 1: Has plaintiff shown by a preponderance of the evidence that his protected activity was one of the factors that motivated defendant not to renew his employment contract?

ANSWER: Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answer QUESTION NO. 1 yes, then please answer the following question:**

QUESTION NO. 2: Has defendant shown by a preponderance of the evidence that the plaintiff's contract would not have been renewed even if he had not engaged in protected activity?

ANSWER: Yes \_\_\_\_\_ No \_\_\_\_\_

Respectfully submitted this 19<sup>th</sup> day of April, 2011.

FOX & FOX, S.C.

/s/ Randall B. Gold

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